

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Rebecca Fricke,  Plaintiff,  v.  Healthcare Revenue Recovery Group, LLC dba ARS Account Resolution Services c/o Illinois Corporation Service Corp 801 Adlai Stevenson Drive Springfield, IL 62703,  Defendant.	Case No.     <b>COMPLAINT</b>  <b>Jury Demand Requested</b>
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**JURISDICTION AND VENUE**

- 1- This court has jurisdiction pursuant to 28 U.S.C. §1331 and 15 U.S.C. §1692k(d).
- 2- Venue is proper because a substantial part of the events giving rise to this claim occurred in this District.

**PARTIES**

- 3- Plaintiff is a resident of the State of Illinois.
- 4- Plaintiff incurred an obligation to pay money, the primary purpose of which was for personal, family, or household uses (the "Debt").
- 5- Defendant is a corporation with its principal place of business in the State of Florida.
- 6- Defendant uses instruments of interstate commerce for its principal purpose of business, which is the collection of debts.
- 7- Defendant regularly attempts to collect, or attempts to collect, debts owed or due another.
- 8- At all times relevant, Defendant owned the Debt or was retained to collect the Debt.

**FACTS COMMON TO ALL COUNTS**

9- On or around January 13, 2015, Plaintiff filed a voluntary bankruptcy petition that included the Debt.

10- Despite the bankruptcy filing, in February 2015, Defendant telephoned Plaintiff to collect the Debt.

11- At the time of this communication, Defendant knew, or should have known, about Plaintiff's bankruptcy filing.

12- Defendant damaged Plaintiff.

13- Defendant violated the FDCPA.

**COUNT I**

14- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

15- Defendant violated 15 USC § 1692e(2) by attempting to collect a debt that Defendant knew, or should have known, was included in Plaintiff's bankruptcy, thereby misrepresenting the legal status of the debt

**COUNT II**

16- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

17- Defendant violated 15 USC § 1692e(10) by falsely representing to Plaintiff that it could collect a debt that Defendant knew, or should have known, was included in Plaintiff's bankruptcy.

**COUNT III**

18- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

19- Defendant violated 15 USC § 1692f by unfairly and unconscionably trying to collect a debt that Defendant knew, or should have known, was included in Plaintiff's bankruptcy.

**COUNT IV**

20- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

21- Defendant violated 15 USC § 1692c(a)(2) by communicating with a consumer after

Defendant knew, or should have known, that Plaintiff was represented by an attorney regarding the debt.

**JURY DEMAND**

22- Plaintiff demands a trial by jury.

**PRAYER FOR RELIEF**

23- Plaintiff prays for the following relief:

- a. Judgment against Defendant for Plaintiff's actual damages, as determined at trial, suffered as a direct and proximate result Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(1);
- b. Judgment against Defendant for \$1,000 in statutory damages for Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(2)(A);
- c. Judgment against Defendant for Plaintiff's reasonable attorneys' fees and costs incurred in this action, pursuant to 15 U.S.C. §1692k(a)(3); and
- d. Any other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

Meier LLC

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